

# **EXHIBIT 8**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**Questions Regarding Inspection and Protocol**

1. Is the malware hosted solely on the laptop being provided?
  - The laptop being provided will host the source code files required by the protocol. Other secure locations for source code or compiled files are not relevant to the inspection ordered by the Court.
  - If not, where is the malware hosted?
  - Is the malware hosted on a Dominion BMD machine?
2. Who is the manufacturer of the laptop?
  - This is not relevant to the to the inspection ordered by the Court. Nevertheless, the computer for the inspection will be a modern Windows compatible laptop (e.g. Dell, Lenovo, HP, etc.) available for purchase in 2023.
3. How much RAM does the laptop have?

- At least 8GB of RAM.

4. What is the operating system hosting the malware?

- The laptop hosting the source code for the Court-ordered inspection will run Windows 11.

5. How old is the laptop that will be used to review the source code?

- Less than a year old.

6. What type of hard drive does the laptop have? (SATA, SSD, IDE, etc.)

- An SSD.

7. Is the laptop configured as a RAID or as a single drive?

- Single drive.
- If it is a RAID, what configuration (RAID0, RAID1, RAID5, etc.)?

8. How much free space does the laptop have?

- This is not relevant to the to the inspection ordered by the Court.

*See Protocol ¶ 7.*

9. How large is the screen?

- 15”

10. What screen size is the laptop configured to use?

- See above.

11. What Major and Minor version of Windows is installed on the laptop?

- A fully updated copy of Windows 11.

12. When was Windows installed on this laptop?

- The laptop will have a recent installation of Windows.

13. Have all Microsoft security patches and updates been installed on this laptop?

- A fully updated copy of Windows 11

14. Will the source files be provided on a flash drive or on the hard drive within the Windows laptop?

- The source code files will be found in a folder on the desktop of the laptop provided for the Court-ordered inspection.

15. What programming language was utilized to develop the files in question, and will the laptop show the contents of the source files by opening them in their native digital format?

- This is explained in Dr. Halderman's July 2021 Report.

Nevertheless, the files were written primarily in Java and Python. A few are written in Smali or bash bunny script, and there are some shell scripts and makefiles.
- All of the programming languages use plain text source files, and the files will be produced as plain text files on the laptop provided for the Court-ordered inspection.

16. Are all files written in the same programming language?

- If not, what are the programming languages used?
- See above.

17. What version(s) of the software was (were) used to write the code?
  - This is not relevant to the inspection ordered by the Court.
18. Is there a compare-to-compare application installed? If so, what is the name of the software and its version?
  - The file compare utility that is included with Windows (fc.exe) will be available on the laptop provided for the Court-ordered inspection.
19. Besides the standard Windows applications that are installed when Windows is installed, what other utilities or software applications (including third party applications) are available for this laptop?
  - The source code will be viewable with an ordinary text editor, such as Windows Notepad, which will be included on the laptop provided for the Court-ordered inspection. As such, no third-party applications will be necessary or available. Nor may any additional software, files, programs, etc. be uploaded or otherwise added to the laptop provided for the Court-ordered inspection, per the Court-ordered protocol.
20. Will the source files that are going to be provided include Alpha, Beta, and GA versions of the source code?
  - The software was never Generally Available (GA) and it has never been released in any form (alpha, beta, etc.). The current version of the files will be produced.

21. Will the original dates and times of the files be preserved?
  - Will those dates and times be provided?
  - This is not relevant to the Court-ordered inspection.
22. Does the laptop have any type of anti-virus or malware detection software installed and running?
  - If so, what are the product names and the versions?
  - Only the antivirus / malware detection features built into Windows will be running on the laptop provided for the Court-ordered inspection.